

-----Original Message-----

**From:** Charles Blankson

**Sent:** Thursday, December 20, 2007 4:01 PM

**To:** 'bramsey@sanjuancapistrano.org'

**Subject:** Villa Montana Apartments DEIR

Dear Mr. Ramsey:

I wasn't sure you had sent me any message and it did not come through.

These are the comments on the above document:

1. Construction Equipment Emission Factors: The lead agency states on page 4-25 of the DEIR that the emission factors have not been updated since they were released in 1985. Please note that current emission factors for off-road (construction equipment) mobile sources compiled by California Air Resources Board can be accessed at [www.arb.ca.gov/msei/offroad/offroad.htm](http://www.arb.ca.gov/msei/offroad/offroad.htm).
2. Construction emissions: The lead agency discusses project emissions in the DEIR and this is ok. However, to facilitate review and for the benefit of the general public, it would be helpful to present the emissions in a summary table format showing each pollutant and the corresponding significance threshold and the significance determination for each pollutant. This was done for operational emissions (see page 4-30 of the DEIR) and should be done also for construction emissions. Please present this in the Final EIR. By the same token, the Construction Emissions Calculation Worksheet in the Appendix shows only VOC emissions from architectural coatings. As the discussion in the DEIR shows, the various types of construction equipment emit other pollutants as well, namely, PM10, NOx and CO. These should all be presented for review in the Final EIR.
3. Localized Significance Thresholds Analysis: Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby sensitive receptors. SCAQMD staff recommends that for this project and future projects, the lead agency undertake the localized analysis to ensure that all feasible measures are implemented to protect the health of residents of nearby sensitive receptors. The methodology for conducting the localized significance thresholds analysis can be found at the SCAQMD website: [www.aqmd.gov/ceqa/handbook/LST/LST.html](http://www.aqmd.gov/ceqa/handbook/LST/LST.html).
4. PM 2.5 Emissions: The discussion of the proposed project's emissions does not include emissions for PM2.5. The SCAQMD has requested that lead agencies quantify PM2.5 emissions since approximately January 2005. Please note that the URBEMIS 2007 model is now available and is recommended for use by SCAQMD staff for the analysis of air quality impacts. The advantages to using the URBEMIS 2007 model are that the model calculates PM2.5 and CO2 emissions, uses EMFAC 2007 on-road emission factors, and the OFFROAD 2007 emissions factors for off-road (construction) equipment. The URBEMIS 2007 model can be accessed at the following website: [www.urbemis.com](http://www.urbemis.com).

You may call me if you have any questions.

Charles Blankson, Ph.D.  
Air Quality Specialist

SCAQMD, CEQA Section  
21865 Copley Drive  
Diamond Bar, CA 91765  
Tel: 909 396-3304  
Fax: 909 396-3324  
[cblankson@aqmd.gov](mailto:cblankson@aqmd.gov)